

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<i>In the Matter of</i>)	
)	
WINDSTREAM HOLDINGS, INC. and)	
)	WC Docket No. 17-110
BROADVIEW NETWORKS HOLDINGS, INC.)	
)	
Application for Consent to Transfer Control of)	
Authorizations to Provide Global Facilities-)	
Based and Global Resale International)	
Telecommunications Services and to Transfer)	
Control of Domestic Common Carrier)	
Transmission Lines, Pursuant to Section 214 of)	
the Communications Act of 1934, as Amended)	
)	

**APPLICANTS' REPLY COMMENTS IN SUPPORT OF
CONSOLIDATED APPLICATIONS TO TRANSFER CONTROL OF
INTERNATIONAL AND DOMESTIC SECTION 214 AUTHORIZATIONS**


Windstream Holdings, Inc. ("Windstream") and Broadview Networks Holdings, Inc. ("Broadview") (collectively, "Applicants") urge the Commission expeditiously to approve their pending applications for consent to transfer indirect control of certain international and domestic Section 214 authorizations held by various wholly-owned subsidiaries of Broadview.

The record demonstrates the public interest benefits of the transaction, including offering a broader portfolio of services to current and future customers and bringing more customers on-net where possible. No party voiced any objection to the transaction (or even commented) in response to the Public Notice.¹ There is no reason to delay approval. To the contrary, the sooner

¹ *Domestic Application Filed for the Transfer of Control of Broadview Networks Holdings, Inc. to Windstream Holdings, Inc., Non-Streamlined Pleading Cycle Established*, Public Notice, DA 17-461, WC Docket No. 17-110 (Wireline Comp. Bur. rel. May 12, 2017).

the transactions are approved, the sooner the Applicants can bring about the public interest benefits identified in the applications. The Applicants respectfully request consent to the transfers of control without delay.

Respectfully submitted,



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_____/s/_____
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June 2, 2017